WARNER & SCHEUERMAN

6 WEST 18TH STREET 10TH FLOOR NEW YORK, NEW YORK 10011 (212) 924-7111 FAX (212) 924-6111

JONATHON D. WARNER
JDWARNER@WSLAW.NYC

KARL E. SCHEUERMAN
KESCHEUERMAN@WSLAW.NYC

March 23, 2023

BY HAND

Pamela K. Chen, U.S.D.J. United States District Court, Eastern District of New York 225 Cadman Plaza East, N 631 Brooklyn, New York 11201-1804

Re:

IME Watchdog, Inc. v. Gelardi, et al. Case No.: 1:22-cv-1032 (PKC)(JRC) Hearing Date: March 27, 2023

Dear Judge Chen:

We represent defendants Safa Gelardi, Vito Gelardi and IME Companions LLC and enclose courtesy hard copies of the following which have been filed on ECF: (1) Defendants' Memorandum Of Law In Opposition To Plaintiff's Order To Show Cause; (2) Declaration of Safa A. Gelardi with exhibits; (3) Declaration of Karl E. Scheuerman, Esq., with exhibits; (4) Declaration of Mark Purificati with exhibits; (5) Declaration of Tiffany Uribe with exhibits; (6) Declaration of Maura Diaz; and (7) Declaration of Vito Gelardi.

Respectfully yours,

/s/ Jonathon D. Warner

cc: Emanuel Kataev, Esq. (by email) (without enclosures)